84-896

(3)

Office - Supreme Court, U.S.
FILED
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ALEXANDER L. STEVAS.
CLERK

NO._____

IN THE

SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 1984

In re HENRY ANDERSON

PETITION FOR WRIT OF MANDAMUS

TO THE SUPREME COURT OF OREGON

EDWIN J. PETERSON, JUDGE, RESPONDENT

PETITION FOR WRIT OF MANDAMUS AND BRIEF IN SUPPORT THEREOF

WRIT OF MANDAMUS

Henry Anderson
676 Covey Road
Valley Springs
Ca. 95252
Petitioner

14pp

QUESTIONS PRESENTED FOR REVIEW

I. Why has petitioner been discriminated against by respondent Oregon State Supreme Court, and deprived of his United States Constitutional Rights to Trial by Jury in Civil Cases?

2. Why has petitioner been discriminated against by respondent, and deprived of his United States Fourteenth Amendment Rights to Equal Protection of the Laws?

3. Why has petitioner been discriminated against by respondent, and deprived of his United States Fourteenth Amendment Rights to Due Process of Law?

4. Why has petitioner been discriminated against by respondent, and deprived of his "inviolate" right to Trial by Jury as given in Article I, Section I7, of the Oregon State Constitution?

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BEACON-THEATRES V WESTOVER, 359, U.S. 500, 5II.

DIMICK V SCHIEDT, 293 U.S. 474, 486.

In BEACON-THEATRES V WESTOVER, 359, U.S. 500, 5II, the Court stated, "the right to grant mandamus to require jury trial where it has been improperly denied is settled."

In DIMICK V SCHIEDT, 293, U.S. 474, 486, the Court said "Maintainance of the jury as a fact-finding body is of such importance and occupies so firm a place in our history and jurisprudence that any seeming curtailment of the right to a jury trial should be scrutinized with the utmost care."

JURISDICTIONAL STATEMENT

Date of judgement of the Supreme Court of Oregon was August 3I, I984.

Date of denial of petition for rehearing by Oregon State Supreme Court was September I8th, I984.

The Court has the power under 28 U.S.C. Section I65I (a) to grant the writ of mandamus in aid of the Court's appellate jurisdiction.

CONSTITUTIONAL PROVISIONS

ARTICLE VI., CLAUSE 2.

This Constitution, and the laws of the United States which shall be made in pursuance thereof,. . . shall be the supreme law of the land; and the judges in every state shall be bound thereby, anything in the constitution or laws of any state to the contrary notwithstanding.

CONSTITUTIONAL PROVISIONS CONTINUED

VII. AMENDMENT. In suits at common law, where the value in controversy shall exceed twenty dollars, the right of trial by jury shall be preserved,. . .

XIV AMENDMENT, in part.

No state shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any state deprive any person of life, liberty, or property without due process of law, nor to deny to any person within its jurisdiction the equal protection of the law.

OREGON STATE CONSTITUTION

ARTICLE I, SECTION I7.

In all civil cases the right of Trial by Jury shall remain inviolate.

OREGON RULES OF CIVIL PROCEDURE

RULE 50. JURY TRIAL OF RIGHT, The right of trial by jury as declared by the Oregon Constitution or as given by a statute shall be preserved to the parties inviolate.

STATEMENT OF THE CASE

Petitioner as the defendant, was deprived of his U.S. Constitutional Right to Trial by Jury, Equal Protection of the Law & Due Process of Law by the Baker County Court in a civil action at Baker, Oregon. Petitioner lost his lifes savings & his property as a result of those illegal, prejudicial acts of the court. Petitioner raised the matter of deprivation of trial by jury, at the first court hearing & has continued to do so at all times since then.

Petitioner had no adequate remedy at law to combat those illegal court actions, and filed a petition for writ of mandamus on July 27, I984 in the Oregon State Supreme Court for relief against the Baker court.

On August 3I, I984, respondent court denied that petition. A copy of that order is attached hereto as exhibit I.

Petitioner filed a petition for rehearing on Sept. I0, I984 with respondent, which the court denied on Sept. I8, I984.

A copy of that order is attached hereto as exhibit 2.

Notwithstanding the plain duty imposed on respondents by law, & notwithstanding the demand of petitioner that respondents perform their legal duties, respondents have failed & refused & will continue to fail & refuse to do their mandatory duties as set forth in the United States Constitution and laws, unless they are ordered to do so by this Court.

Petitioner having no further remedy at law to convince respondent court to act, has now filed this petition for writ of mandamus, in this U.S. Supreme Court.

Petitioner in accordance with the rules has kept this petition as short as possible, by only giving the essentials of the controversy. There is a great quantity of evidence & records to support this petition, which can be made available to the Court if it is needed.

ARGUMENT

There can be no argument about the existance of the United States Constitution. Nor can there be any argument about the obligations of respondents to know and act in accordance with that Constitution. Nor can there be any argument about the prejudice & discrimination practiced against petitioner that is shown by the records and evidence.

What is left is not argument, but wonder, why have respondents neglected their duties and ignored the prejudice & discrimnatory acts of subordinates? In any class of subordinates there are always some with limited mental & moral powers, whose wrongful actions must be corrected from time to time.

There can be no argument that the passage of time transmutes an illegal court action into a legal action, the discrimnatory acts were illegal when they were done and will always be illegal & should be cancelled.

Respondents should be reminded by this Court of their duties and if they hesitate in doing them, must be ordered to do them.

WRIT OF MANDAMUS

WHEREFORE, petitioner prays:

I. That a writ of mandamus issue from this Court directed to the Honorable Oregon State Supreme Court, and to the Honorable Edwin J. Peterson, Chief Justice of said Court, to show cause on a day to be fixed by this Court why petitioner has been deprived of his United States Constitutional Right to Trial by Jury, his Right to Equal Protection of the Law, his Rights to Due Process of Law & his Oregon State Constitutional Right to Trial by Jury;

2. Why mandamus should not issue from this Court directing said Honorable Edwin J. Peterson to vacate & expunge from the record the unconstitutional discrimnatory orders of the Baker County Circuit Court;

3. That petitioner should have such additional relief & process as may be necessary & appropriate in the premises.

Respectfully submitted

Henry Anderson

Henry Anderson, petitioner

IN THE SUPREME COURT OF THE STATE OF OREGON

STATE OF OREGON ex rel HENRY ANDERSON, Plaintiff-Relator, v. BAKER COUNTY CIRCUIT COURT, STATE OF OREGON, Defendant.	)	Baker Circuit Court No. 84-125 SC S30961 **ORDER DENYING PETITION FOR WRIT OF MANDAMUS**

The Court has considered relator's petition for writ of mandamus and ORDERS that the petition be denied.

Dated this 31st day of August, 1984.

Edwin J. Peterson
Chief Justice

APPENDIX EXHIBIT I.

10.

IN THE SUPREME COURT OF THE STATE OF OREGON

STATE OF OREGON ex rel HENRY ANDERSON,	)	
	)	Baker Circuit
	)	Court No. 84-063
Plaintiff-Relator,	)	
	)	
v.	)	SC S31061
	)	
BAKER COUNTY CIRCUIT COURT,	)	**ORDER DENYING**
	)	**PETITION FOR**
Defendant.	)	**WRIT OF MANDAMUS**

The Court has considered relator's petition for writ of mandamus and ORDERS that the petition be denied.

Dated this 18th day of September, 1984.

Chief Justice

APPENDIX EXHIBIT 2.

II.

APPENDIX EXHIBIT 3 I2.

SUPREME COURT
Edwin J. Peterson
Chief Justice

Salem, Oregon 97310
Telephone 378-6026

October 5, 1984

BEST AVAILABLE COPY

Michael Rodak, Jr.
Clerk
Supreme Court of the United States
1 Fir Street N.E.
Washington, D.C. 20543

Re: Henry Anderson, Petitioner
v. Edwin J. Peterson, Judge,
Respondent. Oregon State
Supreme Court

In accordance with Supreme Court Rule 27.2(b) and Rule 21(b) of the Federal Rules of Appellate Procedure, I will make no appearance in response to the petition unless requested to do so by the court.

Sincerely,

Edwin J. Peterson
Chief Justice

EJP:fw
cc: Henry Anderson
676 Covey Road
Valley Springs, California 95252

CERTIFICATE OF SERVICE

I, Henry Anderson, petitioner in this matter certify that on November 28th I984, I served 3 exact copies of the foregoing Petition for Writ of Mandamus on respondent EDWIN J. PETERSON, by mailing them by certified mail, return receipt requested, with postage fully prepaid to the:

COURT ADMINISTRATOR
SUPREME COURT BUILDING
SALEM, OREGON, 973IO

BY: Henry Anderson
Henry Anderson
Petitioner.

Office-Supreme Court, U.S.
FILED
JAN 7 1985
ALEXANDER L. STEVAS,
CLERK

No. 84-896

In the Supreme Court of the United States

OCTOBER TERM, 1984

In re HENRY ANDERSON,

Petitioner.

EDWIN J. PETERSON, Chief Justice,
Supreme Court of the State of Oregon,

Respondent.

On Petition for a Writ of Mandamus to the Supreme Court of the State of Oregon

BRIEF FOR RESPONDENT IN OPPOSITION

DAVE FROHNMAYER
Attorney General of Oregon
WILLIAM F. GARY
Deputy Attorney General
*JAMES E. MOUNTAIN, JR.
Solicitor General
THOMAS H. DENNEY
Assistant Attorney General
400 Justice Building
Salem, Oregon 97310
Phone: (503) 378-4402
Counsel for Repondent

*Counsel of Record

QUESTION PRESENTED

Assuming, without conceding, that petitioner's complaint is properly before the Court, does a state supreme court's refusal to order the reopening of a nine-year-old suit for specific performance, brought in a state trial court, deny petitioner due process of law, equal protection of the laws, or petitioner's Seventh Amendment right to trial by jury, "in suits at common law"?

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Cases Cited

Minneapolis & St. Louis R.R. Co. v. Bombolis, 241 U.S. 211 (1916) 2

Parsons v. Bedford, 3 Pet. 433, 446-47 (1830) 3

Statutory Provisions

28 U.S.C. § 1651 2

BRIEF FOR RESPONDENT IN OPPOSITION

Petitioner's "Jurisdictional Statement," his citations to relevant constitutional and statutory provisions, and his statement of the case are accepted, insofar as they are not inconsistent with the matter set forth below.

SUPPLEMENTAL STATEMENT OF THE CASE

From the petition for a writ of mandamus and the petition for rehearing filed in the Oregon Supreme Court, it appears that in 1975, petitioner Anderson was the defendant in a suit for specific performance of a land sale contract, brought by a Mr. and Mrs. Fisher. (Petition for Rehearing, at 9). Anderson represented himself in this suit and requested a jury trial. The request was denied (Petition for Mandamus, at 1-2). On June 9, 1975, the Circuit Court for Baker County, Oregon, entered a decree in favor of the surviving plaintiff, Mrs. Fisher, (*Id.*, at 15). Anderson apparently did not appeal.

In recent years, Anderson has initiated several proceedings, *in propria persona*, in an effort to cause the 1975 decree against him to be set aside. In the present case, he petitioned the Oregon Supreme Court, on or about June 27, 1984, for a writ of mandamus, commanding the circuit court to vacate its 1975 decree and grant him a new trial, in which his alleged right to a trial by jury in a suit for specific performance would be honored (Petition for Rehearing, at 5). On August 31, 1984, the Oregon Supreme Court denied the petition. On September 7, 1984, Anderson petitioned for rehearing; and

rehearing was denied on September 25, 1984.[1] Anderson now seeks a writ of mandamus from this Court, commanding the Oregon Supreme Court, or its Chief Justice, to "vacate and expunge" the decree against him in the 1975 case of *Fisher v. Anderson*, on the ground that he was denied his constitutional right to a trial by jury, due process of law, and equal protection of the laws in a suit for specific performance, tried in Oregon's trial court of general jurisdiction.

REASONS FOR DENYING THE PETITION

Anderson contends that he was denied his Seventh Amendment right to a trial by jury, and his Fourteenth Amendment right to due process of law and equal protection of the laws, in a 1975 suit for specific performance, brought in the courts of the State of Oregon. To right this alleged wrong, he asks the Court to issue a writ of mandamus to the Oregon Supreme Court, or its Chief Justice, under the authority conferred upon it by 28 U.S.C. § 1651. Assuming, without conceding, that Anderson's choice of procedure is correct, or that his petition should be treated as a petition for certiorari, the claims urged in the petition are without merit.

Anderson was not denied his Seventh Amendment right to a trial by jury. The Seventh Amendment right to a jury trial in civil cases is not applicable to the states. *Minneapolis & St. Louis R.R. Co. v. Bombolis*, 241 U.S. 211 (1916). Even if it were, specific performance is an equitable remedy; and there is

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[1] Anderson is not correct when he states, at pages 4 and 6 of his petition to this Court, that rehearing in this case (Oregon Supreme Court No. S30961) was denied on September 18, 1984. On that date, the court denied Anderson's petition for mandamus in another case, Oregon Supreme Court No. S31061. *Compare* U.S. S. Ct. Petition, Ex. 1, *with id.*, Ex. 2.

no constitutional right to a trial by jury in a suit in equity. *See Parsons v. Bedford*, 3 Pet. 433, 446-47 (1830).

Nor was Anderson denied due process or equal protection in the 1975 suit he wishes reopened. The mere fact that the suit was tried to the court, rather than to a jury, does not constitute a denial of due process of law or equal protection of the laws; and Anderson's petition does not suggest any other basis for his claim that the Due Process and Equal Protection Clauses of the Fourteenth Amendment were violated in this case.

CONCLUSION

For the above reasons, the petition should be denied.

Respectfully submitted,

DAVE FROHNMAYER
Attorney General of Oregon
WILLIAM F. GARY
Deputy Attorney General
JAMES E. MOUNTAIN, JR.
Solicitor General
THOMAS H. DENNEY
Assistant Attorney General
Counsel for Respondent

Office - Supreme Court, U.S.
FILED
FEB 4 1985
ALEXANDER L. STEVAS,
CLERK

NO. 84-896

IN THE

SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 1984.

In re HENRY ANDERSON,

Petitioner,

EDWIN J. PETERSON, Chief Justice
Supreme Court of the State of Oregon

Respondent.

On Petition for a Writ of Mandamus to the Supreme Court of the State of Oregon

MOTION TO DISMISS NON-PARTIES INTRUSION

Henry Anderson
676 Covey Road
Valley Springs
Ca. 95252
Petitioner

QUESTIONS PRESENTED

Did respondent Edwin J. Peterson request the four non-party persons to intrude in this civil case & repudiate his explicit legal words of non-appearance stated by respondent Peterson in his October 5, 1984 letter to the clerk of this Supreme Court?

Can those four non-party persons arbitrarily intrude in this civil case & imply that respondent Peterson has authorized their illegal presence and actions?

Does respondent Peterson have legal authority to let inferior state employees use his judicial powers for their private ends?

How can petitioner make a reply brief to a paper that has no legal standing & which paper is in direct violation of the United States laws on Civil Rights & redressing of deprivation of Equal Protection of the Laws?

Has this Supreme Court asked those 4 non-party persons to intrude in this civil case?

Has this Supreme Court given the 4 non-party persons permission to intrude in this civil case for petition for Writ of Mandamus?

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Beacon-Theatres V Westover, 359 U.S. 500,5II 4.

Bucolo V Adkins 424 U.S. 64I 4,5.

Deen V Hickman 358 U.S. 57 4,5.

Ex parte Cutting 94 U.S. I4, 20-22 2.

In re Leaf Tobacco Board 222 U.S. 578,58I 2.

United Auto Workers V Scofield 382 U.S. 205, 209 2.

CONSTITUTIONAL PROVISIONS

U.S. CONSTITUTION ARTICLE VI. 5.

U.S. CONSTITUTION, VII AMENDMENT 5.

U.S. CONSTITUTION, XIV AMENDMENT 5.

42 USC I985 6.

OREGON STATE CONSTITUTION

ARTICLE I, SECTION I 2,3.

ARTICLE I, SECTION IO 3.

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OREGON REVISED STATUTE I2.070 3.

APPENDIX

EXHIBIT 3 A-I.

PROOF OF SERVICE A-2.

POINTS AND AUTHORITIES

Respondent Peterson had to take an oath of office before assuming his duties, which required respondent to swear to obey the U.S. Constitution & the Oregon State Constitution. Therefore in obeying his oath of office, respondent could not legally or ethically argue against those Constitutions. That is why respondent sent his letter of non-appearance, dated October 5, 1984, to the court clerk; petitioner's exhibit 3, appendix page A-I, herein.

Respondent Peterson has no authority to allow other persons to assume his judicial duties; to contradict & set aside his official judicial statements as stated in his letter to the Clerk of this Supreme Court.

Nor can respondent allow other non-party persons to intrude in this civil case under guise or color of his sponsorship.

This Supreme Court has consistently ruled an "amicus" is not considered to be a party to a case. "One who is not a party to a record & judgement below is not entitled to

appeal therefrom." In re Leaf Tobacco Board 222 U.S. 578, 581. See also United Auto Workers V Scofield 382 U.S. 205, 209. Ex parte Cutting 94 U.S. 14, 20-22.

None of the 4 intruders is a party to the civil case, none of the 4 intruders has an interest in this civil case, none of the 4 intruders has ever appeared in this civil case before.

None of those 4 non-party intruders has requested permission from this Supreme Court to intrude in this civil case, petitioner's petition for Writ of Mandamus.

None of those 4 intruders has received permission from this Supreme Court to intrude in this civil case.

None of the 4 persons has given evidence that respondent Peterson authorized them to illegally intrude in this civil case.

The State of Oregon cannot allow its employees to breach the State Constitution, and discriminate against petitioner in this civil case, with the 4 intruders ignoring the first part of Article I, Section I, of

the Oregon State Constitution, quote, "We declare that all men, when they form a social compact are equal in right; that all power is inherent in the people,. . ."and Article I, Section IO, Administration of justice. "No court shall be secret, but justice shall be administered, openly & without purchase, completely & without delay, and every man shall have remedy by due course of law for injury done him in his person, property, or reputation."

One of the remedies by due course of law being used in this civil case is the remedy given in Oregon Revised Statute I2.070, Action on judgement, decree or sealed instrument. "(I) An action upon a judgement or decree of any court of the United States, or of any state or territory within the United States; shall be commenced within IO years."

The 4 intruders are all state employees and as such they have the duty to remain outside civil cases, be neutral, since their status as state employees injects the issue of discrimination, deprivation of petitioner's

civil rights under "color of law", the 4 intruders have a class based invidious animus towards the pro se petitioner & will stop at nothing to injure petitioner in his person & property for lawfully attempting to enforce his U.S. Constitutional Rights to Equal Protection of the Laws.

Each of those 4 intruders has the duty to obey the rulings of this Supreme Court, yet they contemptuously ignore those rulings & cite cases 155 years old & 69 years old as case law; knowing that the cases have been overruled by this Court and are void.

This Court in Beacon-Theatres, Inc. V Westover 359 U.S. 500, 511 said, "The right to grant mandamus to require jury trial where it has been improperly denied is settled." In this case petitioner was denied his rights to jury trial.

The Supreme Court can issue a writ of mandamus not only to a lower federal court but to a highest court of a state that has disobeyed or failed to give effect to a prior judgement or mandate of the Court. Deen V

Hickman 358 U.S. 57. Bucolo V Adkins 424 U.S. 641.

U.S. Constitution Article VI, This Constitution, and the laws of the United States which shall be made in pursuance thereof; . . ., shall be the supreme law of the land; and the judges in every State shall be bound thereby, anything in the Constitution or laws of any state to the contrary not withstanding.

The VII Amendment, Right to Trial by jury is one of the most important rights.

The XIV Amendment in part says, "No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.

Oregon State Constitution, Article I, Section I7. Jury Trial in Civil Cases. "In all civil cases the right of Trial by Jury shall remain inviolate."

NO WHERE in the U.S. Constitution is the right to a trial by a judge set forth.

NO WHERE in the Oregon State Constitution is the right to a trial by a judge set forth.

Therefore the choice of right is limited & since petitioner has demanded his Constitutional Rights to Trial by Jury, from the first day of this civil case, it is obvious that petitioner has been deprived of his rights to Equal Protection of the Laws.

No where in the U.S. Constitution is there any command that petitioner must invoke the laws of Oregon to secure his Constitutional Rights to Trial by Jury and Equal protection of the Laws.

The 4 intruders have wrongfully in bad faith breached their sworn oaths & in direct violation of 42 USC I985, conspired for the purpose of impeding, hindering & obstructing the due course of justice in this Court by arbitrarily intruding in this civil case, without permission & citing void cases as current case law, also by using indeterminate terms that have no definite

standards of meaning or application set out.

Petitioner in this civil case, can find no Court Rules that require petitioner to write any reply brief to unauthorized intrusions by non-party persons in this civil case.

It is customary in lower court cases where unauthorized papers have been presented, for the opposing party to make a motion to strike or dismiss the unauthorized materials.

Therefore petitioner presents the following motion to dismiss the intruder's paper.

WHEREFORE: petitioner herein moves this Court to dismiss the paper of the 4 non-party intruders as being without standing, since the intruders have no legal status in this proceeding for petition for Writ of Mandamus,

Also:

To grant petitioner his costs of preparing and filing this Motion to Dismiss & such other relief as is just & proper in this civil case.

Dated January 29, 1985.

By: Henry Anderson
Henry Anderson
Petitioner/Pro se.

HE SUPREME COURT
Edwin J. Peterson
Chief Justice

APPENDIX A-I.

Salem, Oregon 97310
Telephone 378-6026

October 5, 1984

BEST AVAILABLE COPY

Michael Rodak, Jr.
Clerk
Supreme Court of the United States
1 Fir Street N.E.
Washington, D.C. 20543

Re: Henry Anderson, Petitioner
v. Edwin J. Peterson, Judge,
Respondent. Oregon State
Supreme Court

In accordance with Supreme Court Rule 27.2(b) and Rule 21(b) of the Federal Rules of Appellate Procedure, I will make no appearance in response to the petition unless requested to do so by the court.

Sincerely,

Edwin J. Peterson
Chief Justice

EJP:fw
cc: Henry Anderson ✓
676 Covey Road
Valley Springs, California 95252

"EXHIBIT 3."

"EXHIBIT 3"

CERTIFICATE OF SERVICE

I, Henry Anderson, petitioner in this matter certify that on January 31, 1985 I served 3 exact copies of the foregoing Motion to Dismiss Non-Parties Intrusion, on respondent EDWIN J. PETERSON, by mailing them by registered mail return receipt requested, with postage fully prepaid to respondent;

EDWIN J. PETERSON
SUPREME COURT BUILDING
SALEM, OREGON, 97310.

By: Henry Anderson
Henry Anderson
Petitioner
Pro Se.

Supreme Court, U.S.
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IN THE

SUPREME COURT OF THE UNITED STATES

October Term, 1984.

In re HENRY ANDERSON,

Petitioner,

EDWIN J. PETERSON, Chief Justice
Supreme Court of the State of Oregon

Respondent.

On Petition for a Writ of Mandamus to the Supreme Court of the State of Oregon

SUPPLEMENTARY BRIEF

Henry Anderson
676 Covey Road
Valley Springs
Ca. 95252
Petitioner

QUESTIONS PRESENTED.

Whether in this petition seeking a Writ of Mandamus, the petitioner should state the amount of his financial loss or injury?

Whether the tort of intentional infliction of mental distress should be stated, since it is obvious from the amount involved, that such mental distress would be a direct result of the financial injury?

SUPPLEMENTAL STATEMENT OF THE CASE

In this civil case petitioner was deprived of his civil rights and his life's savings of "THIRTY THOUSAND DOLLARS" under color of law. There are no taxes, interest or other items included in that $30,000 loss figure.

Petitioner has had of course many additional expenses such as legal fees, filing fees and preparation of documents and briefs.

AUTHORITIES CITED

"Rights in property are basic civil rights." Lynch V Household Finance Corp. 92 S. Ct. III3

"This section (I983) was intended to enforce U.S. Constitutional Amendment XIV, Section I, against state action, whether that action be executive, legislative or judicial." Mitchum V Foster, 92 S.Ct. 2I5I (I972).

"The judicially fashioned doctrine of official immunity does not reach so far as to immunize criminal conduct proscribed by an act of Congress." O'Shea V Littleton Ill. 4I4 U.S. 488.

CERTIFICATE OF SERVICE

I, Henry Anderson, petitioner in this matter certify that on February 12 1985 I served 3 exact copies of the foregoing Supplemental Brief on respondent Edwin J. Peterson, by mailing them by registered mail, return receipt requested with postage fully prepaid to respondent:

EDWIN J. PETERSON
Supreme Court Building
Salem, Oregon, 97310

By: Henry Anderson
Henry Anderson
Petitioner
Pro Se.